



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

December 15, 1997

RE: DOE FEMP
COMMENTS: WORK PLAN FOR
ECOLOGICAL RESTORATION
RESEARCH GRANTS

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed the DOE document, "Work Plan for Ecological Research Grants, Operable Unit 4 Supplemental Project" received on November 24, 1997. Ohio EPA approves of the proposed research activities and believes DOE should move forward with implementation. However, the following comments address needed revisions to the work plan and subsequent task orders:

1) Commenting Organization: OEPA Commenter: OFFO/DSW
Section #: General Comment Pg. #: Line #: Code: M
Original Comment #:

Comment: Reference is made in each of the sections to monitoring and assessment activities. In section 4.0, it is stated that the individual task orders will contain detailed information regarding methodology and duration of monitoring. It seems appropriate that this work plan should contain some detail regarding frequency and duration of monitoring for each of the projects. In addition, Ohio EPA would like the opportunity to review each task order prior to finalization to ensure sufficient detail regarding methodology and monitoring are provided.

2) Commenting Organization: OEPA Commenter: OFFO
Section #: General Comment Pg. #: Line #: Code: M
Original Comment #:

Comment: In order to optimize the information gained by the research activities, it will be important for each grant receiver to include within the "task order" or other appropriate document a review of available research/literature regarding the topic. This will help ensure DOE is not paying to repeat existing research; the researcher has the highest probability of success; and that the research is applicable to final restoration.

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3) Commenting Organization: OEPA Commenter: DSW

Section #: 3.2 Pg. #: 3 Line #: Code:C

Original Comment #:

Comment: The American Chestnut Restoration section states that the seedlings will be grown in a secure area. Please explain how this area will be secured.

4) Commenting Organization: OEPA Commenter: OFFO

Section #: 4.0 Pg. #: 3 Line #: Code:C

Original Comment #:

Comment: The proposed schedule seems unnecessarily long. Initiating the projects a year after the dispute resolution does not appear very timely. DOE should make all efforts to initiate research activities in a more timely manner. This can be accomplished by accelerating the certification of A8P1 as well as by allowing earlier activity starts in A1P1 and the northern property (invasive control, Indiana bat). To the extent Ohio EPA can assist in improving the proposed schedules, we are available.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandegrift, ODH

Manager, TPSS/DERR,CO
Francie Barker, Tetra Tech EM Inc.
Mark Shupe, HSI GeoTrans